

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JEANNETTE FULLER HAUSLER as Successor  
Personal Representative of the Estate of  
ROBERT OTIS FULLER ("BOBBY  
FULLER"), Deceased, on behalf of THOMAS  
CASKEY as Personal Representative of the  
Estate of LYNITA FULLER CASKEY,  
surviving daughter of ROBERT OTIS FULLER,  
THE ESTATE OF ROBERT OTIS FULLER,  
FREDERICK FULLER, FRANCIS FULLER,  
GRACE LUTES, JEANNETTE FULLER  
HAUSLER, and IRENE MOSS,

Petitioner,

-against-

JPMORGAN CHASE BANK, N.A.,  
CITIBANK, N.A., and UBS AG,

Garnishee-Respondents.

09 Civ. 10289 (VM)

In Respect of a Judgment  
Entered in the State of Florida,  
Case No. 02-12475-CA-09

**DECLARATION OF  
IRENE OI-LIN TANG  
CONCERNING SERVICE OF  
DOCUMENTS IN THE  
PEOPLE'S REPUBLIC OF  
CHINA**

**TRANCHE I**

CITIBANK, N.A.,

Garnishee-Respondent  
and Third-Party  
Petitioner,

-against-

BANCO NACIONAL DE CUBA, BANCO  
FINANCIERO INTERNACIONAL, S.A.,  
SHANGHAI PUDONG DEVELOPMENT  
BANK CO. LTD., DRESDNER  
LATEINAMERIKA, f/k/a DRESDNER BANK  
LATEINAMERIKA AG, and JEANNETTE  
FULLER HAUSLER, as Successor Personal  
Representative of the Estate of ROBERT OTIS  
FULLER ("BOBBY FULLER"), Deceased, on  
behalf of THOMAS CASKEY as Personal  
Representative of the Estate of LYNITA

FULLER CASKEY, surviving daughter of	:
ROBERT OTIS FULLER, THE ESTATE OF	:
ROBERT OTIS FULLER, FREDERICK	:
FULLER, FRANCIS FULLER, GRACE	:
LUTES, JEANNETTE FULLER HAUSLER,	:
and IRENE MOSS,	:
	:
	:
Adverse Claimants-	:
Respondents.	:

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-X

IRENE OI-LIN TANG, pursuant to 28 U.S.C. § 1746, hereby declares on information and belief as follows:

1. I am an employee in the Hong Kong office of Davis Polk & Wardwell LLP, attorneys in this proceeding for Garnishee-Respondent and Third-Party Petitioner Citibank, N.A. ("Citibank").

2. On February 24, 2011, I received via email from the New York office of Davis Polk & Wardwell LLP copies and Chinese translations of the following documents for the purpose of sending such documents to Shanghai Pudong Development Bank Co., Ltd. ("Shanghai Pudong Bank") in Shanghai, China: (1) a cover letter dated February 22, 2011 from James L. Kerr to Shanghai Pudong Bank; (2) this Court's February 18, 2011 Order Compelling Turnover of Remaining Funds in Petition I Pursuant to Fed. R. Civ. P. 69 and N.Y. CPLR § 5225(b); (3) a summons to appear before this Court; and (4) the Joint Third-Party Petition Alleging Claims in the Nature of Interpleader filed by Citibank and JPMorgan Chase Bank, N.A. on April 21, 2010.

3. On February 24, 2011, I sent via DHL, a private international courier, English and translated copies of the above-listed documents to the attention of Mr.

SHEN Si, the Corporate Secretary at Shanghai Pudong Bank, No. 12, Zhongshan Dong Yi Road, Shanghai, China 200002, to provide notice to Shanghai Pudong Bank of the above-captioned proceeding in which it may have a claim. A copy of the DHL tracking report bearing tracking number 4209502054, is attached hereto as Exhibit A.

4. According to the tracking report for tracking number 4209502054, this package was delivered to Shanghai Pudong Bank on Friday, February 25, 2011 and signed for by LE XIAO YING.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 11 2011  
Hong Kong, China

By: Irene Tang  
Irene Oi-Lin Tang

## Exhibit A


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### Result Summary

**Waybill: 4209502054**

**Signed for by: LE XIAO YING**
**Friday, February 25, 2011 at 11:02**
**Origin Service Area: > HONG KONG - HONG KONG**
**Destination Service Area: > SHANGHAI - CHINA, PEOPLES REPUBLIC**

<b>Friday, February 25, 2011</b>		<b>Location</b>	<b>Time</b>
12	Delivered - Signed for by : LE XIAO YING	SHANGHAI - CHINA, PEOPLES REPUBLIC	11:02
11	With delivery courier	SHANGHAI - CHINA, PEOPLES REPUBLIC	10:47
10	Arrived at Delivery Facility in SHANGHAI - CHINA, PEOPLES REPUBLIC	SHANGHAI - CHINA, PEOPLES REPUBLIC	10:31
9	Departed Facility in EAST CHINA AREA - CHINA, PEOPLES REPUBLIC	EAST CHINA AREA - CHINA, PEOPLES REPUBLIC	09:22
8	Processed at EAST CHINA AREA - CHINA, PEOPLES REPUBLIC	EAST CHINA AREA - CHINA, PEOPLES REPUBLIC	09:17
7	Arrived at Sort Facility EAST CHINA AREA - CHINA, PEOPLES REPUBLIC	EAST CHINA AREA - CHINA, PEOPLES REPUBLIC	08:24
6	Departed Facility in HONG KONG - HONG KONG	HONG KONG - HONG KONG	03:40
5	Processed at HONG KONG - HONG KONG	HONG KONG - HONG KONG	03:36
4	Arrived at Sort Facility HONG KONG - HONG KONG	HONG KONG - HONG KONG	00:25
<b>Thursday, February 24, 2011</b>		<b>Location</b>	<b>Time</b>
3	Departed Facility in HONG KONG - HONG KONG	HONG KONG - HONG KONG	23:28
2	Processed at HONG KONG - HONG KONG	HONG KONG - HONG KONG	23:18
1	Shipment picked up	HONG KONG - HONG KONG	16:59

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